



BellSouth Telecommunications, Inc.  
333 Commerce Street, Suite 2101  
Nashville, TN 37201-3300

guy.hicks@bellsouth.com

November 16, 2001

Guy M. Hicks  
General Counsel

615 214 6301  
Fax 615 214 7406

VIA HAND DELIVERY

David Waddell, Executive Secretary  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37238

Re: *Docket to Determine the Compliance of BellSouth  
Telecommunications, Inc.'s Operations Support Systems with State  
and Federal Regulations*  
Docket No. 01-00362

Dear Mr. Waddell:

Enclosed is a copy of BellSouth's non-proprietary Supplemental Responses to Interrogatories and Requests for Production propounded by the CLECs. Copies are being provided to counsel of record.

Very truly yours,

Guy M. Hicks

GMH:ch  
Enclosure

POSTED  
11/16/01

**REQUEST:** Please produce all documents that relate to, reflect or represent all compensation paid to KCI under its master agreement, including but not limited to compensation paid for Georgia and Florida OSS testing.

**RESPONSE:** BellSouth has paid KPMG approximately \$39 Million thus far for the Georgia OSS testing. In addition, BellSouth responds that KPMG does perform work for BellSouth other than the third party tests.

**SUPPLEMENTAL REQUEST:**

**BellSouth did not identify the amounts that BellSouth has paid KPMG for the Florida third party test.**

**SUPPLEMENTAL RESPONSE:**

**At the request of the Florida Public Service Commission, BellSouth will not be providing information with respect to compensation paid for the Florida OSS testing.**

**REQUEST:** Please produce all drafts, revisions and edits of the Georgia Master Test Plan and all subparts respectively revised and agreed upon by KCI and BellSouth to include but not limited to revisions filed with the GPSC on 10/16/99, 12/15/99 and 3/21/2000.

**RESPONSE:** BellSouth has no documents responsive to this request.

**SUPPLEMENTAL REQUEST:**

**This request sought drafts and revisions of the Georgia Master Test Plan, which BellSouth helped develop. BellSouth, however, claims that it has no documents responsive to this request.**

**SUPPLEMENTAL RESPONSE:**

**BellSouth reiterates that there are no documents responsive to this request.**

BellSouth Telecommunications, Inc.  
Tennessee Regulatory Authority  
Docket No. 01-00362  
AT&T/TCG/SECCA's  
1<sup>st</sup> Request for Production  
of Documents  
September 17, 2001  
Supplemental Item 5  
Page 1 of 1

**REQUEST:** Please produce all drafts, revisions, and edits of the Georgia Final and Supplemental Test Reports, including, but not limited to, related electronic mail, notes, memoranda and other correspondence.

**RESPONSE:** Documents responsive to this request are considered proprietary. Because these documents are voluminous, and because BellSouth has already produced these documents to AT&T in North Carolina, Docket No. P-55, Sub 1022 and Georgia Docket No. 8354-U, BellSouth is not producing them to AT&T again. BellSouth will submit one set of these documents to the TRA and counsel for SECCA. For other CLECs, these documents will be made available for inspection at a mutually convenient time at BellSouth's offices, 333 Commerce Street, Nashville, TN 37201.

**SUPPLEMENTAL REQUEST:**

**Upon request, KPMG provided BellSouth with draft test reports at various time while the test was ongoing. BellSouth produced some drafts of the Georgia Final and Supplemental Test Reports, but did not produce any related electronic mail, notes, memoranda and other correspondence. It is difficult to believe no such documents exist.**

**SUPPLEMENTAL RESPONSE:**

**All documents responsive to this request have already been provided to AT&T as part of NCUC P-55, Sub 1022, AT&T's 1<sup>st</sup> Request for Production of Documents, Item 7. BellSouth has submitted one set of these documents to the TRA and counsel for SECCA.**

**REQUEST:** Please produce all withdrawn "draft exception" reports and related documents, to include but not limited to all comments sent or received from BellSouth and any subsequent communications, and all communications from BellSouth to KCI for the Georgia and Florida OSS Tests.

**RESPONSE:** All exception reports and BellSouth responses for the Florida OSS Test can be viewed on the Florida Public Service website:  
<http://www.scri.net/psc/industry/telecomm/oss/oss.html>

Documents responsive to this request are considered proprietary. Because these documents are voluminous, and because BellSouth has already produced these documents to AT&T in North Carolina, Docket No. P-55, Sub 1022 and Georgia Docket No. 8354-U, BellSouth is not producing them to AT&T again. BellSouth will submit one set of these documents to the TRA and counsel for SECCA. For other CLECs, these documents will be made available for inspection at a mutually convenient time at BellSouth's offices, 333 Commerce Street, Nashville, TN 37201.

**SUPPLEMENTAL REQUEST:**

**BellSouth states that it has already produced responsive documents. AT&T however, has not been able to find any withdrawn draft exception reports in the documents previously produced by BellSouth.**

**SUPPLEMENTAL RESPONSE:**

**The documents were produced for the Georgia withdrawn draft exceptions. All were provided to AT&T during the Georgia discovery. BellSouth has submitted one set of these documents to the TRA and counsel for SECCA**

**REQUEST:** Please produce all documents that refer or relate to evaluations of the adequacy of BellSouth's change management process in the Georgia and Florida OSS Tests.

**RESPONSE:** There are no documents responsive to this request in BellSouth's possession, custody or control.

**SUPPLEMENTAL REQUEST:**

**BellSouth states that it has no documents responsive to the request that it produced all documents that refer or relate to evaluations of the adequacy of BellSouth's change management process in the Georgia and Florida OSS tests. BellSouth, however, must have produced documents to KPMG as part of that evaluation, responded internally to such exceptions and drafted responses to KPMG's exceptions. Thus, there cannot possibly be no documents in BellSouth's control that are responsive to this request.**

**SUPPLEMENTAL RESPONSE:**

**To the extent that there are documents available, they are listed in the Georgia Master Test Plan and Supplemental Test Plan and Final Report or in the response to exceptions or observations. These documents are voluminous. If AT&T will identify specific documents AT&T wishes to review, BellSouth will endeavor provide such documents.**

BellSouth Telecommunications, Inc.  
Tennessee Regulatory Authority  
Docket No. 01-00362  
AT&T/TCG/SECCA's  
1<sup>st</sup> Request for Production  
of Documents  
September 17, 2001  
Supplemental Item 40  
Page 1 of 1

REQUEST: Please produce all documents related to BellSouth providing different treatment to local service requests from one or more states, (e.g., Florida and Georgia) over local service requests from another state (e.g. Tennessee).

RESPONSE: BellSouth has no documents responsive to this request.

**SUPPLEMENTAL REQUEST:**

**BellSouth states that it has no documents responsive to the request that it produced all documents related to BellSouth providing different treatment to local service requests from one or more states (e.g. Florida and Georgia) over local service requests for another state (e.g. Tennessee). This cannot be true. PwC's work papers indicate that BellSouth issued written instructions to stop the preference treatment it had discovered. Also, more likely than not, there were written instructions to institute the practice of preferential treatment in the first place.**

**SUPPLEMENTAL RESPONSE:**

**All personnel were reminded to follow normal ISO practices via a management memo. BellSouth did not produce this memo since AT&T had already received it through PriceWaterhouseCoopers discovery. BellSouth is submitting a copy of this document to the TRA and the other parties (attached). There are no other documents responsive to this request.**

BellSouth Telecommunications, Inc.  
Tennessee Regulatory Authority  
Docket No. 01-00362  
AT&T/TCG/SECCA's  
1<sup>st</sup> Request for Production  
of Documents  
September 17, 2001  
Supplemental Item 40  
Attachment  
Page 1 of 1

**ATTACHMENT**



**Jones, Jerry**

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**From:** Dee Freeman-Butler [D\_Freeman-Butler@m3.com]  
**Sent:** Tuesday, April 24, 2001 5:32 PM  
**To:** 'K Ainsworth'; 'J Argo'; 'Frank Batusic'; 'Mark Butterworth'; 'Janet Fields'; 'Bryant Green'; 'Joy Lofton'; 'Jon Sullivan'; 'Bill Thrasher'  
**Cc:** 'Dee Freeman-Butler'; Wilson-Chu, Kathy  
**Subject:** In today, Out Today, Everyday  
  
**Importance:** High

Team,

I just had another call asking about our priorities in working CLEC LSRs. I am increasingly confused as to why we keep getting these questions. Please make double-dad-gum sure that every Who in Whoville absolutely understands without a shadow of a doubt that we are Regional Centers and we make our duration requirement by working first in-first out! We have taken on the challenge of the GA-mandated 18 hour duration across the board, and you are winning in every category!!! You will be receiving charts from Glenn Boylan that prove it -- please post them liberally!

I know you have posted signs in the centers that say: **In today, Out today, Everyday.** Hang them closer to the doors (or something) to be sure visitors see them. Read them aloud to those who appear more than marginally nearsighted or oblivious to their existence.

When a CLEC gets in a particular ditch or mechanized systems act up, we do work arounds to keep CLECs in line and not affect their ability to process orders due to a BellSouth glitch of any kind. That is fine, we need to ensure everyone has an equal chance, just try and watch for the new hire, the occasional visitor or tour group that can get the wrong idea and think we are deviating from normal ISO practices. Ensuring all CLECs are treated equally is an important part of our ISO process.

Please call if you have any questions at all, or if you would like to discuss.

Thank you for all you do everyday to ensure our success and make this a **GREAT PLACE TO WORK!!** I am hearing increasingly positive reports from CLECs as well as our interdepartmental partners!

Thanks,  
Dee

**REQUEST:** Please produce all drafts (including those reflecting proposed revisions or comments by either party) of any reports exchanged between BellSouth and PWC regarding the regionality of BellSouth's OSS.

**RESPONSE:** BellSouth has no documents responsive to this request.

**SUPPLEMENTAL REQUEST:**

**BellSouth states that it has no documents responsive to the request that it produce all drafts (including those reflecting proposed revisions or comments by either party) or any reports exchanged between BellSouth and PwC regarding the regionality of BellSouth's OSS. In his deposition, however, Mr. Lattimore state that drafting the attestation report was a collaborative effort. It is difficult to imagine how BellSouth could have collaborated with PWC in drafting the attestation and not have any draft documents.**

**SUPPLEMENTAL RESPONSE:**

**BellSouth reiterates that there are no documents responsive to this request.**

**REQUEST:** Please produce all state-specific performance measurement reports (e.g., "FCC format" and SQM) for each month since January, 2000 for Tennessee, Georgia, and Florida. Also produce all corresponding regional reports for the same period.

**RESPONSE:** Please reference the files for the BellSouth SQM reports for January through December 2000 and January through August 2001. BellSouth began preparing FCC format reports in April 2001. Included in the attached files are the reports for April 2001 through August 2001. These files are available for inspection at 333 Commerce Street, Nashville, TN 37201.

**SUPPLEMENTAL REQUEST:**

**BellSouth did not produce documents responsive to this request.**

**SUPPLEMENTAL RESPONSE:**

**Documents responsive to this request were produced in BellSouth's original response to this request for Production of Documents filed October 12, 2001.**

**REQUEST:** Please produce all correspondence referring or relating to the Georgia OSS Test, including electronic mail, between or among any of the following entities: KPMG, BellSouth, the GPSC, HP and PWC.

**RESPONSE:** Documents responsive to this request are considered proprietary. Because these documents are voluminous, and because BellSouth has already produced these documents to AT&T in North Carolina, Docket No. P-55, Sub 1022 and Georgia Docket No. 8354-U, BellSouth is not producing them to AT&T again. BellSouth will submit one set of these documents to the TRA and counsel for SECCA. For other CLECs, these documents will be made available for inspection at a mutually convenient time at BellSouth's offices, 333 Commerce Street, Nashville, TN 37201.

**SUPPLEMENTAL REQUEST:**

**BellSouth references its response in North Carolina to a similar request, but the North Carolina request did not include PWC. To the extent that BellSouth corresponded with PWC (including electronic mail), BellSouth must produce these documents.**

**SUPPLEMENTAL RESPONSE:**

**All correspondence related to this request has been provided.**

**REQUEST:** Produce copies of all documents that relate to the performance of LCSC operations, including, but not limited to, "LCSC Weekly Operations Reports," "LCSC Daily Reports", or similarly captioned reports from January 2000 to the present.

**RESPONSE:** BellSouth has produced documents responsive to this request. If parties desire further documentation for periods prior to those produced, contact BellSouth.

**SUPPLEMENTAL REQUEST:**

**BellSouth produced LCSC production reports and call answer reports, but has not produced the LCSC duration reports, service order accuracy, or questionable activity reports**

**SUPPLEMENTAL RESPONSE:**

**LCSC duration and questionable activity reports were provided in the documents filed on October 12, 2001. Service order accuracy are part of the MSS reports provided as part of the Production of Documents, but also can be found, and are publicly available at the following website:  
<http://www.interconnection.bellsouth.com/mss/index.html>**

**REQUEST:** Produce the performance measurement plan that BellSouth utilizes to collect and report internal performance data that BellSouth utilizes to monitor and manage the productivity and performance of its personnel, work centers, and other organizational units involved in pre-ordering, ordering, provisioning, maintenance & repair, or billing functions for BellSouth's wholesale operations or, to the extent that BellSouth does not segregate its wholesale operations and retail operations, for BellSouth's overall operations.

**RESPONSE:** Documents responsive to this request are considered proprietary and will be made available for inspection at a mutually agreed upon time at 333 Commerce Street, Nashville, TN., subject to protective agreement.

**SUPPLEMENTAL REQUEST:**

**BellSouth has not yet responded to this request.**

**SUPPLEMENTAL RESPONSE:**

**This request was fully responded to in BellSouth's supplemental filing on October 18, 2001**

REQUEST: Since January 2000, produce any document that compares or analyzes BellSouth's internal performance data to evaluate the extent to which BellSouth's actual performance results for OSS functions (pre-ordering, ordering, provisioning, maintenance & repair, and billing) are similar in each state of its nine state region.

RESPONSE: See attached.

**SUPPLEMENTAL REQUEST:**

**The request sought documents that compares or analyzes BellSouth's internal performance data to evaluate the extent to which BellSouth's actual performance results for OSS functions are similar in each state of its nine state region. In response, BellSouth produce the PWC attestation reports. Those reports, however, do not evaluate actual performance results. BellSouth, moreover, did not produce its ranking report, which does compare state-to-state performance.**

**SUPPLEMENTAL RESPONSE:**

**The ranking report was not deemed responsive to this request or any other in this docket. It was not identified until October 23, 2001 – two weeks after this Production of Documents submission. See Turf Results report provided as part of POD 51. Also, see Attachment to Supplemental Interrogatory Item 52 for a copy of the Ranking Report filed in Kentucky.**

**REQUEST:** Please identify all persons who provided any information for purposes of answering these interrogatories and for each person identify the Interrogatory with which that person assisted.

**RESPONSE:**

Milton McElroy (Director- BellSouth Interconnection Operations); Kathy Wilson-Chu (Director – BellSouth Interconnection Operations); Maria Boykin (Contractor - BellSouth Interconnection Operations); Beth Craig (Operations Director – BellSouth Interconnection Operations); Olivia Mahon (Manager - BellSouth Interconnection Operations); Ranae Stewart (Program Manager – BellSouth Product Commercialization).

Ron Pate (Director – Interconnection Operations)-Victor Wakeling (Manager-Federal Regulatory) Alphonso Varner (Senior Director-Interconnection) Keith Milner (Senior Director) Ken Ainsworth (Director)

**SUPPLEMENTAL REQUEST:**

**BellSouth did not identify the interrogatory with which the named persons were associated.**

**SUPPLEMENTAL RESPONSE:**

**Milton McElroy – 2-19, 22-28, 30, 32-34, 39, 42, 44, 49-50**  
**Kathy Wilson-Chu – 20, 29, 35, 44**  
**Maria Boykin – 53**  
**Beth Craig – 21**  
**Ranae Stewart – 31**  
**Ron Pate – 37, 44, 54**  
**Al Varner –36, 43, 47-48, 51-52**  
**Keith Milner –41**  
**Ken Ainsworth – 40, 45-46**  
**Chuck Blackburn – 38**  
**Patti Klein – 55-56**



REQUEST: From January 2001 to present, for each individual state in BellSouth's region and for the BellSouth region in total, please identify the achieved flow through rate and the CLEC error excluded flow through rate, by interface (i.e., LENS, TAG, EDI, and all interfaces) for the following categories:

- a) LNP;
- b) UNE;
- c) Business Resale;
- d) Residence Resale; and
- e) Total (i.e., UNE, Business Resale, and Residential Resale combined)

RESPONSE: BellSouth does not produce this data on flow through rates on a per state basis. Please reference the attached file, *TN Docket No. 01-00362 No. 36.xls*, for the BellSouth for the achieved flow through rate and the CLEC error excluded flow through rate, by interface for the months of January 2001 through August 2001.

**SUPPLEMENTAL REQUEST:**

**BellSouth states that it does not produce flow through data on a state-specific basis. According to KPMG, however, BellSouth is capable of producing such data. BellSouth, therefore, should either produce the requested data or explain why producing such data is not technically feasible.**

**SUPPLEMENTAL RESPONSE:**

**BellSouth has reviewed the Georgia Third Party Test, Florida Third Party Test Exceptions and Observations as well as the Georgia Third Party Test KPMG Consulting Flow-Through Evaluation Final Report. There is no mention of the state-specific reports or any questions about BellSouth's capability to produce State Specific Reports for Flow-through nor are there any exceptions or observations that addressed this issue. As part of KPMG's Flow-Through Evaluation, they conducted multiple interviews, including 2 with AT&T (one on 01/25/2000 and one**

**SUPPLEMENTAL RESPONSE (continued):**

date unknown) that are part of KPMG's work papers. BellSouth's position remains the same. AT&T is misinformed on this issue. BellSouth has no record of an issue of state specific reporting capability for Flow-Through Reports in the Flow-through Evaluation (FT-1) conducted by KPMG in their OSS Evaluation for the Georgia Public Service Commission. Unless AT&T can identify the KPMG Exception or Observation as part of either the Georgia or Florida Third Party Test, or indicate where this capability is addressed in the Flow-Through Evaluation Final Report, BellSouth maintains that the Flow-Through Report is a regional report as indicated in the SQM.

Flow through is a measurement of a regional process using ordering systems that are the same throughout the entire region. This measurement has been designed to report flow through results for residence, business, UNEs and LNP and, within these groupings, by individual CLEC. This measurement as is presently implemented does not further disaggregate flow through results by state. BellSouth has not done an in-depth investigation to ascertain the technical feasibility, cost, or implementation effort associated with the development of state specific reports as requested by AT&T. BellSouth has determined in our preliminary high-level analysis that data collection such as Fatal Rejects, as a category, can only be counted in a regional format. In addition, if technical feasibility could be determined, the development effort to implement such a measurement would require considerable programming effort and it's associated costs.

**REQUEST:** Identify all of the internal measures that BellSouth utilizes to monitor and manage the productivity and performance of its personnel, work centers, and other organizational units involved in pre-ordering, ordering, provisioning, maintenance & repair, or billing functions for BellSouth's wholesale operations or, to the extent that BellSouth does not segregate its wholesale operations and retail operations, for BellSouth's overall operations. Such internal measures may include, but are not limited to, those external measures contained in any BellSouth's Service Quality Measurement Plan. The work centers and other organizational units would include, but are not limited to BellSouth's: (a) local carrier service centers; (b) residential service center; (c) business service center; (c) regional central office operations; (d) regional installation and maintenance operation; (e) regional engineering and construction operations; (f) work management centers; (g) network reliability center; (h) address/facility inventory group; (i) circuit provisioning group; (j) customer wholesale interconnection services (CWINS) center; (k) billing data centers.

**RESPONSE:** Please see attached.

**SUPPLEMENTAL REQUEST:**

**BellSouth did not identify the internal measures it uses to measure its wholesale operations, such as those at its local carrier service center (LCSC) or custom wholesale interconnection services (CWINS) center.**

**SUPPLEMENTAL RESPONSE:**

**The following are the performance measures for the CWINS center.**

**Resale**

**ET/TT**

- 1. Quality of Documentation**
- 2. Testing/Trouble Isolation & Resolution**

3. Ticket Hand-offs
4. Close Out
5. Customer Contact

**MA**

1. Calls Handled
2. Troubles Screened

**UNE**

**ET/TT**

1. Quality of Documentation
2. Testing/Trouble Isolation & Resolution
3. Ticket Hand-offs
4. Close Out
5. Customer Contact

**MA**

1. Calls Handled
2. Troubles Screened

**Provisioning Tech**

1. Productivity
2. Quality

The following are the performance measures for the LCSC center.

**Resale**

1. Quality
2. Quantity

**UNE**

1. Quality
2. Quantity
3. Team

**Complex**

1. Quality
2. Quantity
3. Team

**Service Reps Resale**

1. Questionable Activity
2. Adherence
3. Accuracy/Validity of Clarification

**Service Reps UNE**

1. Questionable Activity
2. Adherence
3. Accuracy/Validity of Clarification

**Service Reps Atlanta**

1. Quality
2. Quantity

**These documents were included as part of POD 51.**

**REQUEST:** Identify all of the internal reports that BellSouth utilizes to communicate and analyze the data generated by the internal performance measures identified in the preceding interrogatory.

**RESPONSE:** Please see BellSouth's response to Production of Documents No. 51.

**SUPPLEMENTAL REQUEST:**

**BellSouth references its response to Production of Documents No. 51. That production consists of approximately two inches of documents that are a mish-mash of billing reports. BellSouth's response does not contain any reports related to other OSS functions. For example, BellSouth did not produce its "Ranking Report," which was identified by Mr. Heartley as a report used by BellSouth and which BellSouth agreed to produce in Kentucky as a late-filed exhibit.**

**SUPPLEMENTAL RESPONSE:**

**AT&T is incorrect in their statement regarding reports related to other OSS functions. Copies of reports were included from all organizations that responded to Interrogatory 51. However, the Ranking Report brought up by Mr. Heartley in KY occurred on October 23, 2001 following the filing of original responses on October 12, 2001 and supplemental responses on October 18, 2001 in the TN OSS docket.**

**In trying to be responsive, attached is a copy of the Ranking Report. This document is considered proprietary and is being provided subject to protective agreement.**

### CERTIFICATE OF SERVICE

I hereby certify that on November 16, 2001, a copy of the foregoing document was served on counsel for known parties, via the method indicated, addressed as follows:

☐ Hand  
☒ Mail  
☐ Facsimile  
☐ Overnight

James P. Lamoureux  
AT&T  
1200 Peachtree St., NE, #4068  
Atlanta, GA 30367

☐ Hand  
☒ Mail  
☐ Facsimile  
☐ Overnight

James Wright, Esq.  
United Telephone - Southeast  
14111 Capitol Blvd.  
Wake Forest, NC 27587

☒ Hand  
☐ Mail  
☐ Facsimile  
☐ Overnight

H. LaDon Baltimore, Esquire  
Farrar & Bates  
211 Seventh Ave. N, # 320  
Nashville, TN 37219-1823

☒ Hand  
☐ Mail  
☐ Facsimile  
☐ Overnight

Henry Walker, Esquire  
Boult, Cummings, et al.  
P. O. Box 198062  
Nashville, TN 37219-8062

☒ Hand  
☐ Mail  
☐ Facsimile  
☐ Overnight

Jon E. Hastings, Esquire  
Boult, Cummings, et al.  
P. O. Box 198062  
Nashville, TN 37219-8062

☒ Hand  
☐ Mail  
☐ Facsimile  
☐ Overnight

Timothy Phillips, Esquire  
Office of Tennessee Attorney General  
P. O. Box 20207  
Nashville, Tennessee 37202

☒ Hand  
☐ Mail  
☐ Facsimile  
☐ Overnight

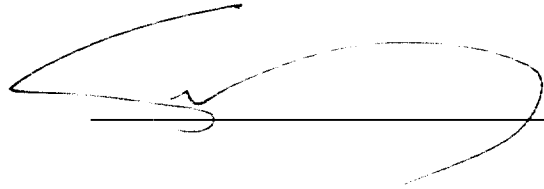
Charles B. Welch, Esquire  
Farris, Mathews, et al.  
618 Church St., #300  
Nashville, TN 37219

☐ Hand  
☒ Mail  
☐ Facsimile  
☐ Overnight

Terry Monroe  
Competitive Telecom Assoc.  
1900 M St., NW, #800  
Washington, DC 20036

- ☒ Hand  
☐ Mail  
☐ Facsimile  
☐ Overnight

Jack Robinson, Esquire  
Gullett, Sanford, Robinson & Martin  
230 Fourth Ave., N., 3d Fl.  
Nashville, TN 37219-8888

A handwritten signature in dark ink, appearing to be 'J. Robinson', written over a horizontal line.